

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiff**

v.

CIVIL CASE NO. 19-1930 (PAD)

**FUNDS IN THE AMOUNT OF
\$53,082,824.19.00 IN U.S. CURRENCY,
CONTAINED IN THE FOLLOWING
ACCOUNTS UNDER THE NAME OF
BANCO SAN JUAN INTERNATIONAL:**

**a. xxx-x7689 – MERRILL LYNCH
ADDRESS: #15 SECOND ST., SUITE
210, GUAYNABO, PR 00968, UP TO
\$10,000,000.00;**

**b. xxx-x7059 – MERRILL LYNCH
ADDRESS: 225 LIBERTY ST., 41ST
FL, NEW YORK, NY 10281, UP TO
\$5,000,000.00; AND**

**c. FEDERAL RESERVE BANK OF NEW
YORK ACCOUNT # xxxx-x228-6, UP
TO \$38,082,824.19,**

Defendant.

UNITED STATES OF AMERICA’S MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by and through its undersigned attorneys, and files this motion to restrict *United States’ Response in Opposition to Claimant’s Motion to Treat this Matter as a Related Case at Docket No. 26*, for the reasons more specifically set forth below:

In compliance with the requirements of this Court’s Standing Order No. 9, dated January 30, 2013, the United States respectfully requests that the Pleading be accepted by the Court for

Civil Case No. 19-1930 (PAD)

filing with the following level of restriction: *SELECTED PARTIES: Limiting viewing to the attorney filing the document, attorney for the Claimant and the Court.*

The United is filing the Pleading with the requested level of restriction, because the level of restriction requested is necessary to protect the confidentiality of information contained in a sealed case referenced by the claimant.

As more fully set forth in the Pleading, the protection of the information detailed therein, outweighs the presumption of public access.

WHEREFORE, the United States respectfully prays the Court accept and file the Pleading under the requested restriction level, and that an ORDER issue directing the Pleading to remain under such restriction level until further order by the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically sends copies to all appearing parties.

RESPECTFULLY REQUESTED.

In San Juan, Puerto Rico, this 27th day of November 2019.

W. STEPHEN MULDROW
United States Attorney

s/David O. Martorani-Dale

David O. Martorani-Dale
Assistant U.S. Attorney
U.S.D.C.-PR 226004
350 Carlos Chardón Street
Torre Chardón
Hato Rey, Puerto Rico 00918
Tel. (787) 766-5656
Fax. (787) 771 4050
Email: david.o.martorani@usdoj.gov